

REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 1-16 were pending in this application. Claims 1-2 and 9-10 have been cancelled, and claims 3, 6-8, 11 and 14 have been amended hereby. Accordingly, claims 3-9 and 11-16 will be pending herein upon entry of this Amendment. It is noted that the title of the invention has also been amended and that the dependency of claims 7 and 8 have been modified to address the claim objection in the Office Action. For the reasons stated below, Applicants respectfully submit that all claims pending in this application are in condition for allowance.

In the Office Action, claims 1-4, 6, 9-12, 14 and 15 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 5,187,481 to Hiller. The remaining claims were rejected under 35 U.S.C. §103(a) as being unpatentable over Hiller in view of U.S. Patent 6,577,257 to Brooks. To the extent these grounds of rejection might still be applied to claims presently pending in this application, they are respectfully traversed.

Claim 3, as amended, recites a scrambler for scrambling said digital dither signal with an offset signal so as to generate a dithered offset signal, a digital-to-analog converter for converting said dithered offset signal into an analog dithered offset signal, and an analog-to-digital converter for converting said dithered image signal into said digital image signal. The offset signal that may be generated by a microprocessor in response to brightness adjustment made by a user is independent of the digital image signal. See Specification of the present application at page 7:1-8. To the contrary, Fig. 6 of Hiller merely discloses that "digital random

noise words are converted to an analog dither by a digital-to-analog converter (DAC) 18” without being scrambled with any offset signal. *See col. 4:65-66.* Moreover, correction circuitry comprising a multiplier 30 and an accumulator 32 is provided to reduce gain error resulting from the presence of the dither signal residue in the digital output 28 so that the output of the accumulator 32 is designated to “GAIN CONTROL” to adjust the gain of the DAC 18. *See col. 5:18-40.* Accordingly, the GAIN CONTROL cannot be converted by the DAC 18, but can be employed for gain control. Similar arguments are applicable to independent claim 11.

Claim 6, as amended, recites an adder for adding said digital dither signal with an offset signal so as to generate a dithered offset signal, a digital-to-analog converter for converting said dithered offset signal into an analog dithered offset signal, and an analog-to-digital converter for converting said dithered image signal into said digital image signal. The offset signal that may be generated by a microprocessor in response to brightness adjustment made by a user is independent of the digital image signal. *See Specification of the present application at page 7:1-8.* To the contrary, Fig. 6 of Hiller discloses that a digital processor 80 processes the digital samples of the output signal 28 to predict the value of the next samples which is subtracted in a summation block 82 from the dither signal generated in the PRN generator 16. *See col. 10:61-66.* Thus, the output of the digital processor 80 is dependent of the output signal 28 for the purpose of prediction, not an offset signal. Similar arguments are applicable to claim 14.

For the reasons stated above, Applicants respectfully submit that none of the amended claims is anticipated by Hiller, and that Brooks fails to overcome the deficiencies of Hiller. As such, the §102 and §103 prior art rejections should be withdrawn.

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In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

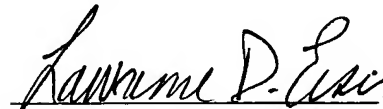
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Respectfully submitted,

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